

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., et al.,¹
Debtor.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

MOTION FOR LEAVE TO FILE LATE NON-CUSTOMER PROOF OF CLAIM FORM

NOW INTO COURT, through undersigned counsel, comes claimant Yangjing Lin (hereinafter “claimant”), who respectfully requests that this Honorable Court grant leave to file his Non-Customer Proof of Claim (attached herein as Exhibit “A”) with Kroll, beyond the June 30, 2023, deadline to file claims.

Claimant is the victim of an elaborate cryptocurrency theft scam. Claimant’s funds were traced to four (4) FTX destination wallet addresses, identified in the Claimant’s cryptocurrency blockchain tracing report (attached herein as “Exhibit B”). Claimant did not discover his funds had been transferred to FTX until after the Non-Customer Bar Date. Claimant is Plaintiff in a case filed in the Eastern District of Louisiana.² A clerk’s default was entered in Claimant’s favor on January 23, 2024.

Claimant will expeditiously file his Proof of Claim following this Court’s ruling on the matter.

WHEREFORE, claimant Yangjing Lin respectfully requests that this court grant leave to file late Non-Customer Proof of Claim with Kroll.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Lin v. DEFENDANT “1” a/k/a “Fanxin Lin” and JOHN DOES 1-20; CASE NO. 2:23-cv-05878.

Respectfully Submitted,

/s/ Reagan Charleston Thomas

Reagan Charleston Thomas

LA Bar No. 38522

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ATTORNEY FOR YANGJING LIN

CERTIFICATION BY COUNSEL

Pursuant to Local Rule 9010-1(e)(iii), I certify that I am eligible to file the aforementioned Proof of Claim in this Court and further certify that I am admitted, practicing, and in good standing as a member of the Bar of the State of Louisiana and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

I also certify that I am generally familiar with the Local Rules of this Court.

Dated: February 29, 2024.

Respectfully Submitted,

/s/ Reagan Charleston Thomas

Reagan Charleston Thomas

LA Bar No. 38522

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ATTORNEY FOR YANGJING LIN

[PROPOSED] ORDER

Before the Court is the *Motion for Leave to File Late Non-Customer Proof of Claim* [ECF No. 8266] (the “**Motion**”), filed by Yangjing Lin (a “**Claimant**”).

Considering the Motion filed by the Party on the record in this case,

IT IS ORDERED that the Motion is **APPROVED**, and as set forth in the Motion, Claimant may file his Non-Customer Proof of Claim with Kroll.